

# **EXHIBIT C**

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**From:** Adam Kurland <akurland@akkpc.com>  
**Sent:** Thursday, June 26, 2025 4:09 PM  
**To:** Ferraro, Vincent M.  
**Cc:** Zinna, Michael; Kelly, Ryan  
**Subject:** Re: Telebrands v. BHSD Trading, Case No. 23-cv-225, Instrument No. 2025-122802

**CAUTION: This message originated outside of Kelley Drye and was sent by: [akurland@akkpc.com](mailto:akurland@akkpc.com)**

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*Vin,*

*Good afternoon. Respectfully, we do not confirm, for the reasons stated in my June 17 email to you. We do reiterate our position that we remain ready, willing and able to produce Mr. Perlmutter in his representative capacity on behalf of the judgment debtor. Please confirm.*

*adam*

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On Tue, Jun 24, 2025 at 9:11 AM Ferraro, Vincent M. <[VFerraro@kelleydrye.com](mailto:VFerraro@kelleydrye.com)> wrote:

Adam,

Thank you for your email.

You have no basis to object to Mr. Perlmutter being deposed in his individual capacity and, tellingly, you cite to no case law to support your objection. We served a valid subpoena on Mr. Perlmutter. We therefore intend to depose Mr. Perlmutter in his individual capacity and not as a representative of BHSD Trading.

We will take you up on your offer to host the deposition, which, to confirm, will be at your office in New City, NY on Tuesday, July 8 starting at 2 PM ET. Please confirm.

Regards,

Vin

**VINCENT FERRARO**

**Kelley Drye & Warren LLP**

Tel: (973) 503-5927

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**From:** Adam Kurland <[akurland@akkpc.com](mailto:akurland@akkpc.com)>

**Sent:** Tuesday, June 17, 2025 5:41 PM

**To:** Ferraro, Vincent M. <VFerraro@KelleyDrye.com>

**Cc:** Zinna, Michael <MZinna@KelleyDrye.com>; Kelly, Ryan <RKelly@KelleyDrye.com>

**Subject:** Re: Telebrands v. BHSD Trading, Case No. 23-cv-225, Instrument No. 2025-122802

*Vin,*

*Good afternoon and thank you for your email. Our position is as follows -*

*We object to Mr. Perlmutter being deposed in his individual capacity. Any information he has and about which he may testify will be based on his ownership interest in BHSD, LLC, the judgment creditor. We are therefore only willing to produce him in his representative capacity*

*on behalf of BHSD. To be clear, Mr. Perlmutter does not have any knowledge of the assets of BHSD other than as a member of that entity.*

*As to the start time, 2pm is fine and yes, if need be and within reason, we can go past 5pm.*

*We will not travel to NYC for the deposition but would certainly be amenable to hosting it in my office. Otherwise we could always do it virtually.*

*I look forward to hearing from you.*

*adam*

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On Mon, Jun 9, 2025 at 12:54 PM Ferraro, Vincent M. <[VFerraro@kelleydrye.com](mailto:VFerraro@kelleydrye.com)> wrote:

Adam,

Thank you for confirming receipt of the subpoena. In response to your questions, we will be taking Mr. Perlmutter's deposition in his individual capacity, not on behalf of BHSD Trading, LLC. Further, July 8 at 2 PM for Mr.

Perlmutter's deposition works for us, provided you and your client will agree to go into the evening if necessary. We cannot, for example, agree to a 2 PM start time if you and/or your client expect to leave at 5 or 6 PM. Alternatively, if that is going to be a problem, we propose starting at 11 AM. Also, would Mr. Perlmutter be amenable to an in-person deposition at our office at 3 World Trade Center?

Thanks,

Vin

**VINCENT FERRARO**

**Kelley Drye & Warren LLP**  
Tel: (973) 503-5927

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**From:** Adam Kurland <[akurland@akkpc.com](mailto:akurland@akkpc.com)>  
**Sent:** Friday, June 6, 2025 11:28 AM  
**To:** Ferraro, Vincent M. <[VFerraro@KelleyDrye.com](mailto:VFerraro@KelleyDrye.com)>  
**Cc:** Zinna, Michael <[MZinna@KelleyDrye.com](mailto:MZinna@KelleyDrye.com)>; Kelly, Ryan <[RKelly@KelleyDrye.com](mailto:RKelly@KelleyDrye.com)>  
**Subject:** Re: Telebrands v. BHSD Trading, Case No. 23-cv-225, Instrument No. 2025-122802

Good morning. Receipt of the subpoena is acknowledged. That said, a couple of things, in no particular order, as follows -

1. Please confirm that Mr. Perlmutter would be testifying on behalf of and as the representative of BHSD Trading, LLC, the judgment debtor?;
2. I am unavailable on June 12 for the deposition; I would like to propose June 30, July 7 or July 8, on each date starting at 2:00pm; and please advise if you are amenable to a remote dep; and
3. BHSD is assetless; given that, which you will learn from Mr. Perlmutter, what is it that your client is looking for here? It seems that Telebrands is throwing good money after bad. Happy to discuss further if you'd like.

adam

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On Thu, Jun 5, 2025 at 4:54 PM Ferraro, Vincent M. <[VFerraro@kelleydrye.com](mailto:VFerraro@kelleydrye.com)> wrote:

Counsel,

We write to inform you that we have served a subpoena ad testificandum on Mr. Perlmutter, BHSD Trading LLC's principal, compelling his attendance at a deposition next Thursday, June 12, 2025, in connection with post-judgment discovery in this matter. Attached is a courtesy copy of the subpoena. If you represent Mr. Perlmutter in connection with this subpoena, please inform us promptly.

Best,

Vin

**VINCENT FERRARO**

Special Counsel

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vferraro@kelleydrye.com

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